

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re ) Chapter 7  
 ) Case No. 17-38251  
Jennifer A. Taylor, ) Hon. Janet S. Baer  
 ) (Kane County)  
 ) Hearing Date: September 28, 2018  
Debtor. ) Time: 11:00 a.m.

**COVER SHEET FOR APPLICATION FOR  
PROFESSIONAL COMPENSATION**

Name of Applicant: Baldi Berg, Ltd.

Authorized to Provide  
Professional Services to: Elizabeth C. Berg, Trustee

Date of Order Authorizing  
Employment: March 2, 2018

Period for Which  
Compensation is sought: February 3, 2018 to Close of Case

Amount of Fees sought: \$1,170.00

Amount of Expense  
Reimbursement sought: \$289.11

This is an: Interim Application ☐ Final Application ☒

If this is not the first application filed herein by this professional, disclose as to all prior fee applications:

<u>Date Filed</u>	<u>Period Covered</u>	<u>Total Requested (Fees &amp; Expenses)</u>	<u>Total Allowed</u>
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**Not Applicable**

The aggregate amount of fees and expenses paid to the Applicant to date for services rendered and expenses incurred herein is: \$ -0-.

Dated: August 23, 2018

Baldi Berg, Ltd.

By: /s/Elizabeth C. Berg

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re	)	Chapter 7
	)	Case No. 17-38251
Jennifer A. Taylor,	)	Honorable Janet S. Baer
	)	(Geneva)
Debtor.	)	Hearing Date: September 28, 2018
	)	Hearing Time: 11:00 a.m.

**First Application for Allowance and Payment of Final Compensation and Expense  
Reimbursement of Baldi Berg, Ltd., Attorneys for Trustee**

Baldi Berg, Ltd. ("BB"), attorneys for Elizabeth C. Berg, as trustee ("Trustee") of the estate ("Estate") of Jennifer A. Taylor, debtor ("Debtor"), pursuant to section 330 of title 11, United States Code ("Code"), request this Court to enter an order for the allowance and payment to BB of \$1,170.00 as final compensation for 6.00 hours of legal services rendered to the Trustee from February 2, 2018 through the close of this case and reimbursement of \$289.11 for actual and necessary expenses incurred in the performance of those services. In support thereof, BB respectfully states as follows:

**Introduction**

1. The Debtor commenced this case on December 28, 2017 ("Petition Date") by filing a voluntary petition for relief under chapter 7 of the Code.
2. Elizabeth C. Berg is the duly appointed, qualified and acting chapter 7 trustee in this case.
3. As of the commencement of this case, the Estate's sole asset was non-exempt equity in a 2012 Chevy Traverse ("Property").
4. The bar date for filing general unsecured claims in this case was May 8, 2018 and the bar date for filing governmental claims was June 26, 2018.

**Retention of Baldi Berg, Ltd.**

5. On March 2, 2018, the Court entered an ordered authorizing Trustee to employ Elizabeth C. Berg and the law firm of Baldi Berg, Ltd. as her counsel in this case. A copy of the

order authorizing Trustee to retain BB is attached hereto as Exhibit A. BB has served as counsel for Trustee at all times since its retention.

6. The professional qualifications and experience of the BB attorneys and paralegals who have performed legal services for the Trustee during the period covered by this Application are set forth in Exhibit B. The attorneys and paralegals who were responsible for representing the Trustee in this case are:

Elizabeth C. Berg – Partner  
Ricki K. Podorovsky - Paralegal  
Jason M. Manola – Paralegal

#### **Prior Compensation and Expense Reimbursement**

7. This is the first and final application ("Application") for allowance and payment of compensation and expense reimbursement that BB will file in this case.

#### **Services Rendered by BB**

8. Itemized and detailed descriptions of the specific services rendered by BB to the Trustee for which compensation is sought in this Application are reflected on the billing statements attached hereto as Exhibit C. The billing statements set forth the name of each attorney or paralegal, the amount of time spent rendering each service, the date on which each service was rendered, a description of the service rendered and the total number of hours of services rendered by each attorney or paralegal in each category.

9. The services rendered by BB were in connection with general case administration matters. BB advised the Trustee regarding her duties and obligations under the Code. BB thoroughly reviewed and analyzed the value of the Property and a potential sale of the Property to CarMax. BB prepared and presented motions on behalf of the Trustee including the Trustee's Application to Employ Attorneys as well as a Motion to Sell Property under 363(f) - Automobile ("Motion to Sell"). The Trustee's Motion to Sell was approved by this Court pursuant to an order dated March 2, 2018 [dkt no. 29]. BB also prepared a Report of Sale in connection with the sale of

the Property to CarMax. In addition, BB also advised the Trustee regarding issues related to closing this case and prepared this final fee application. In connection with the foregoing, BB expended 6.00 hours of services for which it requests reduced compensation in the amount of \$1,170.00.

10. All of the services performed by BB were required for proper representation of the Trustee in this case, were authorized by this Court and were performed by BB at the request and direction of the Trustee. Pursuant to Section 330 of the Code and the generally applicable criteria with respect to the nature, extent and value of the services performed, all of BB's services are compensable and the compensation requested herein is fair and reasonable. There has been no duplication of services rendered to the Trustee by BB for which compensation is requested. In those instances, where two attorneys participated in any matter, such joint participation was necessary due to the complexity of the problems involved.

11. The rates charged by the attorneys and paralegals of BB in this Application, as adjusted from time to time, are their usual and customary hourly rates charged during the period covered by this Application for work performed for other clients in both bankruptcy and non-bankruptcy matters. A list of each person who performed services for the Trustee and their hourly rate is contained in the billing statements attached hereto as Exhibit C.

#### **Compensation Requested**

12. BB has not entered into any agreement or understanding of any kind, express or implied, with any other entity to share any compensation or expense reimbursement to be received by BB for services rendered to the Trustee or expenses incurred in connection with this case.

13. BB has not previously received or been promised any payments for services rendered or expenses incurred in this case.

14. The Affidavit of Elizabeth C. Berg pursuant to Rule 2016 of the Federal Rules of Bankruptcy Procedure is attached hereto as Exhibit D and made a part hereof.

15. The proposed source for payment of the compensation requested in this Application

are the Estate funds in the Trustee's possession, collected by her during her administration of this case.

#### **Expense Reimbursement Requested**

16. BB has incurred actual and necessary expenses totaling \$289.11 in connection with the performance of the services described herein for which it requests reimbursement. The expenses relate to the filing fee for the Trustee's Motion to Sell Automobile under 363(f), postage and copies for the Notice to Sell Automobile, and the Title Transfer Fee for the sale of the Property to CarMax. A detailed itemization of the expenses for which BB requests reimbursement is included within the billing statements attached hereto as Exhibit C.

#### **Status of the Case**

17. The Trustee has administered all of the assets belonging to this Estate and completed her review and analysis of the claims filed against the Estate.

18. Trustee has completed and filed her Final Report simultaneously herewith. A final fee application for the Trustee has also been filed concurrently with this Application.

#### **Financial Condition of the Case**

19. Trustee currently has \$6,586.00 on deposit in the Estate's bank account. The Chapter 7 administrative expenses that are currently owing and those the Trustee anticipates the Estate will incur prior to the closing of this case include 1) the fees and expenses allowed to Trustee in connection with her final fee application, 2) the legal fees allowed to Baldi Berg, Ltd. in connection with this final fee application, and 3) any other fees which may be due or outstanding to the offices of the United States Trustee and the Clerk of the United States Bankruptcy Court.

20. Following payment of all Chapter 7 administrative expenses set forth above, Trustee anticipates that there will be sufficient funds to make a distribution to general unsecured creditors totaling approximately 7.5% of allowed claims.

#### **Trustee's Approval**

21. BB certifies that the Trustee has received, reviewed and approved this Application.

WHEREFORE, Baldi Berg, Ltd., attorneys for Elizabeth C. Berg, as trustee, requests the entry of an order providing the following:

- A. Allowing to Baldi Berg, Ltd. final compensation in the amount of \$1,170.00 for actual and necessary professional services rendered to the Trustee from February 2, 2018 through the closing of this case;
- B. Allowing to Baldi Berg, Ltd. reimbursement of expenses in the amount of \$289.11;
- C. Authorizing the Trustee to pay the amounts awarded from the funds in the case as part of her final distribution; and
- D. For such other and further relief as this Court deems appropriate.

Dated: July 30, 2018

Baldi Berg, Ltd.

Attorneys for Elizabeth C. Berg, as trustee of the  
estate of Jennifer A. Taylor, Debtor

By: /s/ Elizabeth C. Berg

Elizabeth C. Berg  
Baldi Berg, Ltd.  
20 N. Clark St. Suite 200  
Chicago, IL 60602  
312.726.8150

**Baldi Berg, Ltd.  
Final Fee Application**

**Jennifer A. Taylor, Debtor  
Case No. 17-38251**

**Retention Order**

**Exhibit A**

Document Page 1 of 1  
UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
Eastern Division

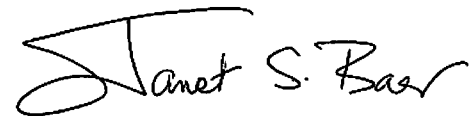
In Re:	)	BK No.: 17-38251
Jennifer A. Taylor	)	
	)	
	)	Chapter: 7
	)	Honorable Janet S. Baer
	)	Kane
Debtor(s)	)	

**Order Authorizing Trustee to Employ Attorneys**

THIS CAUSE comes before this Court on the Trustee's Application to Employ Elizabeth C. Berg and the law firm of Baldi Berg, Ltd. as attorneys for Trustee and the supporting affidavit of Elizabeth C. Berg; and the Court being fully advised in the premises:

IT IS HEREBY ORDERED that Elizabeth C. Berg, as trustee of the estate of Jennifer A. Taylor, debtor, is authorized to employ Elizabeth C. Berg and the law firm of Baldi Berg, Ltd. to act as counsel for the Trustee, with compensation and reimbursement of expenses to be paid in such amounts as may be allowed by this Court, only upon further application.

Enter:



Honorable Janet S. Baer

United States Bankruptcy Judge

Dated: March 02, 2018

**Prepared by:**

Elizabeth C. Berg  
Baldi Berg, Ltd.  
20 N. Clark Street, Suite 200  
Chicago, IL 60602  
(312) 726-8150



**Baldi Berg, Ltd.  
Final Fee Application**

**Jennifer A. Taylor, Debtor  
Case No. 17-38251**

**Professional Qualifications**

**Exhibit B**

**Baldi Berg, Ltd.**

**Elizabeth C. Berg**

Elizabeth C. Berg is the managing partner of Baldi Berg and focuses primarily on her chapter 7 trustee practice and representing other bankruptcy trustees and creditors in chapter 7 bankruptcies. Mrs. Berg has represented and worked with her partner Joseph Baldi since his appointment to the panel of private trustees in 1988. In October 2010, Mrs. Berg was appointed as a private chapter 7 trustee by the United States Trustee's Office for the Northern District of Illinois. Mrs. Berg also has experience representing lenders, borrowers and receivers in commercial foreclosure actions.

Mrs. Berg is admitted to practice in the State of Illinois and the United States District Court for the Northern District of Illinois. She is a member of the National Association of Bankruptcy Trustees and the American Bankruptcy Institute.

Mrs. Berg received her Juris Doctor in 1989 from Loyola University School of Law where she was the recipient of the Lawyers Cooperative Publishing Company's American Jurisprudence Award for Excellent Achievement in the Study of Bankruptcy. She received her certification as a paralegal from Roosevelt University in Chicago, Illinois and received her Bachelor of Arts degree from Brown University in French Language and Culture.

In addition to practicing law, Mrs. Berg has also been a part-time instructor in the Paralegal Studies Department of Northwestern Business College and has volunteered both her time and financial support to the Credit Abuse Resistance Education (CARE) program in the Chicago area.

**Baldi Berg, Ltd.**

**Ricki K. Podorovsky**

Ricki K. Podorovsky is a paralegal with the firm. Ms. Podorovsky has worked with Baldi Berg, Ltd. since 2001. Ms. Podorovsky has worked with Chapter 7 Trustees for approximately 20 years. Ms. Podorovsky received her Paralegal Certificate with honors from Roosevelt University in Chicago, Illinois. Ms. Podorovsky received her Bachelor of Arts degree from University of Iowa in Philosophy.

**Jason M. Manola**

Jason M. Manola is a Paralegal with the firm. Mr. Manola has worked with Baldi Berg, Ltd. since 2011. He is a member of the Chicago Bar Association, DuPage County Bar Association, and the Sports Lawyers Association. Mr. Manola received his Paralegal Certificate from the College of DuPage in Glen Ellyn, Illinois and holds a Private Detective License with the Illinois Department of Financial and Professional Regulation. Mr. Manola received his Bachelor of Arts degree from the University of Iowa in Sports Management and Entrepreneurship.

**Baldi Berg, Ltd.  
Final Fee Application**

**Jennifer A. Taylor, Debtor  
Case No. 17-38251**

**Billing Statements**

**Exhibit C**

**Baldi Berg, Ltd.**  
**20 N. Clark Street**  
**Suite 200**  
**Chicago, IL 60602**

Phone: (312) 726-8150

Fax: (312) 470-6323

FEIN: 36-4352753

**Invoice submitted to:**

July 19, 2018

Invoice No: 03058

Elizabeth C. Berg, Trustee  
 Baldi Berg, Ltd.  
 20 N. Clark Street  
 Suite 200  
 Chicago, ILLINOIS 60602

**In Reference to:** *Taylor, J - General Administration***Professional Services**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Charges</u>
2/03/2018	RKP	Draft motion to sell vehicle (.8); draft proposed order (.1) and 2002 notice (.2); phone call with Car Max to confirm terms of sale (.1); draft motion to employ Baldi Berg (.4); affidavit (.1); proposed order (.1); review and edit same (.2); prepare 2002 service list (.3)	2.30 \$195.00/ hr	\$448.50
2/05/2018	JMM	Edit Trustee's App to Employ Attorneys (.2), Edit Trustee's App to Sell Automobile (.4), Serve Rule 2002 Notice on 23 Creditors (.4)	1.00 \$195.00/ hr	\$195.00
3/27/2018	JMM	Draft Report of Sale - 2012 Chevy Traverse sold to CarMax (.6), Edit Report of Sale with ECB edits (.2)	0.80 \$195.00/ hr	\$156.00
7/18/2018	JMM	Prepare BB Fee Application (1.2), Prepare coversheet, affidavit and proposed order (.3), Review and edit Fee App (.4)	1.90 \$195.00/ hr	\$370.50
Total Fees				\$1,170.00

**Expenses**

<u>Start Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Charges</u>
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**Baldi Berg, Ltd**

7/19/2018

Taylor, J - General Administration

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2/05/2018	Rule 2002 Notice sent to 23 Parties (23 x \$.47 = \$10.81)	1.00 @ /each	\$10.81
2/05/2018	Rule 2002 Notice sent to 23 Parties (1 Pg x \$.10/pg x 23 parties = \$2.30)	1.00 @ /each	\$2.30
2/05/2018	Filing Fee for Trustee's Motion to Sell Automobile under 363(f)	1.00 @ /each	\$181.00
3/06/2018	Miscellaneous Expense - CarMax Title Transfer Processing Fee	1.00 @ /each	\$95.00
Total Expenses			<u>\$289.11</u>
Total New Charges			<u>\$1,459.11</u>
Previous Balance			\$0.00
Balance Due			<u><u>\$1,459.11</u></u>

***Timekeeper Summary***

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Jason M Manola	3.70	\$195.00
Ricki K Podorovsky	2.30	\$195.00
	<u>6.00</u>	

**Baldi Berg, Ltd.  
Final Fee Application**

**Jennifer A. Taylor, Debtor  
Case No. 17-38251**

**Rule 2016 Affidavit**

**Exhibit D**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re	)	Chapter 7
	)	Case No. 17-38251
Jennifer A. Taylor,	)	Hon. Janet S. Baer
	)	(Kane County)
	)	
Debtor.	)	

**Rule 2016 Affidavit**

State of Illinois     )  
County of Cook     )

I, Elizabeth C. Berg, being first duly sworn upon oath, do depose and state as follows:

1. I am a shareholder of Baldi Berg, Ltd. and am authorized to execute this affidavit on behalf of Baldi Berg, Ltd.

2. I have read the Application for Allowance and Payment of Final Compensation of Baldi Berg, Ltd., Attorneys for Trustee ("Application") and all of the factual matters set forth therein are true to the best of my knowledge, information and belief. Baldi Berg, Ltd. has performed the services set forth and described in the Application at the request and pursuant to the direction of the Trustee.

3. A copy of the Application has been provided to Trustee and the Trustee has reviewed and approved the Application.

4. Baldi Berg, Ltd. has not previously received payment of any compensation for services rendered in connection with this case. Baldi Berg, Ltd. has not entered into any agreement with any other person or persons for the sharing of compensation to be received for services rendered in connection with this matter, except among the principals and associates of Baldi Berg, Ltd.

5. Further affiant sayeth naught.

  
Elizabeth C. Berg

Subscribed and Sworn to before me  
this 30<sup>th</sup> day of July, 2018

  
Notary Public



**Exhibit D**